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AUGUST 8, 2003

Federal Communications Commission,
Office of the Secretary
445 12th Street, SW
Washington, D.C. 20554

Subject: Reply Comments
Reference: ET Docket No 03-104 (Broadband over Power Line)

To Whom it May Concern:

As a retired engineer with over four decades of experience in telecommunications and a licensed radio amateur for sixty-two years, I am very concerned about the implications of the contemplated broadband over power line (BPL)

Given the wide swaths of HF and low VHF spectrum occupied by high speed data signals and the variations in medium and low voltage power line transmission systems, I believe interference problems are inevitable both to and from BPL. Such interference can seriously impair use of HF and low VHF spectrum. Users of this spectrum include fixed, land mobile, aeronautical mobile, maritime mobile, radio location, broadcast, amateur radio and radio astronomy, and VHF TV.

To date, I believe the limited field trials performed by BPL advocates have not demonstrated that the elevation of the "noise floor" resulting from radiation of the high data rate/wide band frequency spectrum associated with BPL will not seriously impair the above services. It is my understanding that none of the field trials to date have specifically included amateur radio. nor have any incorporated interference studies.

Definition and performance of adequate testing to comprehensively address the many variables will be a formidable task. However, I believe the Commission has wisely recognized the need for such testing.

Particular attention must be directed to ensure the BPL system is not susceptible to interference from licensed amateur radio operation. The situation of amateur service is unique. If, for example, reception of direct broadcast VHF television is degraded by power line radiation of the BPL spectrum, the unhappy viewer may be advised he is in a "fringe area" and he can expect no relief. Similar response is likely for the short wave broadcast listener who finds reception of the BBC becomes impossible. Government, maritime or aviation services likely will be able to enforce relief to interference.

However, the situation of the amateur radio operator is very different. Although his transmissions maybe in total compliance with power and signal purity regulations for the amateur service, if his neighbors digital subscriber link fails when he transmits, he is the "bad guy". Further, he can expect no relief if reception of amateur frequencies is impossible due to wide band noise radiated from BPL.

Since the beginning of radio communication amateur radio operators have made many contributions in public service and to the technology. They continue to do so. Now there is also participation in home land security communications. Moreover, amateur radio is making significant contribution to education in many areas of science and technology.

We must continue to provide a viable environment for the amateur radio service. We can not afford to lose this national resource.

Respectfully submitted John L. Kennedy

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